

Please find attached ESBG's response to the "T2S Consultation Paper: general principles and high-level proposals for the user requirements". This response is the result of a wide consultation with our membership.

Whilst we have used as requested the table to insert our responses, we would like to use this opportunity to add some remarks on the General Principles:

As to Principle 3: the proposition that the T2S settlement is to be "used by CSDs for the benefits of their users" should be strengthened by a requirement for CSDs to pass on benefits derived from T2S in a transparent and undistorted manner.

As to Principle 5: it is recommended that the possibility to also use interim ISIN or interim securities numbers or common codes be contemplated.

As to Principle 10: we would understand that a "non-euro T2S capability" could be based on a second, distinct system running in parallel to T2S, which could be introduced in a second phase.

As to Principle 12: whilst CSDs' participation should not be mandated, the decision of any CSD to participate or not must be the outcome of a wide and transparent user consultation process.

As to Principle 17: the maintenance and evolution of the ECSDA rules should rest on a governance and process that are agreed with the users.

Of course we remain at your disposal to discuss these views further.

Best regards,

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Associations internationales sans but lucratif/Internationale verenigingen zonder  
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